



U.S. Department of Justice
Civil Division, Federal Programs Branch
950 Pennsylvania Ave., NW
Washington, DC 20530

By ECF

August 1, 2025

The Honorable Frederic Block
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 10007

Re: *Tanya Asapansa-Johnson Walker v. Robert F. Kennedy, Jr., et al*, No. 20-cv-02834 (FB) (VMS)

Dear Judge Block:

Pursuant to this Court's Electronic Order Lifting Stay dated July 8, 2025, the parties hereby propose the following schedule:

- Deadline for Defendants to produce the administrative record to Plaintiff: August 20, 2025.
- Deadline for Plaintiff's motion for summary judgment: November 20, 2025.
- Deadline for Defendants' cross-motion for summary judgment and Defendants' opposition to Plaintiff's motion for summary judgment: January 15, 2026, with a consolidated brief.
- Deadline for Plaintiff's opposition to Defendants' cross-motion for summary judgment and Plaintiff's reply: February 20, 2026, with a consolidated brief.
- Deadline for Defendants' reply: March 23, 2026.
- Deadline for Joint Appendix of Administrative Record Materials Cited or Otherwise Relied Upon by the Parties in Summary Judgment Briefing: April 6, 2026.

The Court requested a proposed "schedule for the *filing* of the administrative record and motions for summary judgment thereon." Electronic Order Lifting Stay (July 8, 2025) (emphasis added). Given the size of the rule making record, Defendants are unable to upload it for filing on CM/ECF. The parties propose that Defendants produce the record to Plaintiff using electronic file sharing software and that the parties file on the docket a joint appendix containing copies of those portions of the record that are cited or otherwise relied upon in summary judgment briefing. *See* 5 U.S.C. § 706 ("the court shall review the whole record *or those parts of it cited by a party*") (emphasis added). The United States District Court for the District of Columbia has adopted this procedure in its Local Rules. *See* Rule 7(n) of the Rules of the United States District Court for the District of Columbia. Should the Court desire access to the whole record, the parties request that the Court direct Defendants to provide access to a chambers e-mail address to be provided by the Court.

Respectfully submitted,

EDWARD J. JACOBS

/s/ Edward J. Jacobs

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